

ELLIS:LAWHORNE

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June 8, 2010

VIA ELECTRONIC MAIL SERVICE

The Honorable Jocelyn G. Boyd
Chief Clerk
South Carolina Public Service Commission
PO Drawer 11649
Columbia SC 29211

RE: Genesis Telecommunications, LLC, Complainant,
v. United Telephone of the Carolinas d/b/a CenturyLink (f/k/a Embarq),
Defendant/Respondent
Docket No. 2009-311-C, ELS File No. 2194-11696

Dear Jocelyn:

I am writing to respond to CenturyLink's May 26, 2010 letter requesting that it be allowed to file a late-filed exhibit in this proceeding. CenturyLink asserts that the documents labeled "Late Filed Exhibit Six" "show the relationship of the standards in the Exhibits to Mr. Showers' testimony to the standards developed by the T1E1.4 group referenced in the Agreement." CenturyLink further seeks Commission acceptance of these documents as a late-filed exhibit "to ensure the completeness of the record."

CenturyLink's request is not appropriate. This "exhibit" was not prefiled by any CenturyLink witness, nor were these documents referenced by any CenturyLink witness. Furthermore, as CenturyLink's letter concedes, these documents are not the "standards developed by the T1E1.4 group referenced in the Agreement." No Commissioner requested that the record be held open to allow any such exhibit to be filed. CenturyLink did not request that the record be held open for any such hearing exhibit.

"Ensuring the completeness of the record" is not an appropriate rationale to allow parties to file documents of their choosing after the hearing has been closed. If this were the case, then parties could "complete the record" with documents (or testimony) filed after the close of a hearing, and thereby avoid any cross-examination or other challenge to the authenticity, veracity, or relevance of those documents.

With kind regards, I am

Yours truly,

/S/ John J. Pringle, Jr.
John J. Pringle, Jr.

cc: Nannette S. Edwards, Esquire (via electronic mail service)
Scott Elliott (via electronic mail service)
Susan S. Masterton (via electronic mail service)
Mr. John Lawrence (via electronic mail service)